

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

VAMCO INTERNATIONAL, INC.,	)	
	)	
Plaintiff,	)	Civil Action No. _____
	)	
v.	)	
	)	JURY TRIAL DEMANDED
THE MINSTER MACHINE COMPANY,	)	
	)	
Defendant.	)	

**COMPLAINT**

Plaintiff Vamco International, Inc., through its counsel, Reed Smith LLP, hereby alleges the following for its Complaint against Defendant The Minster Machine Company.

**JURISDICTION AND VENUE**

1. This Complaint alleges patent infringement claims under the Patent Act, 35 U.S.C. §271, *et seq.*
2. This Court has subject matter jurisdiction for such patent claims pursuant to 28 U.S.C. §§ 1331 and 1338.
3. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) and 1400(b), in that, for example, acts of infringement have been committed in this judicial district.

THE PARTIES

4. Plaintiff Vamco International, Inc. (“Vamco”) is a Pennsylvania corporation having its principal place of business at 555 Epsilon Drive, Pittsburgh, Pennsylvania 15238.

5. Upon information and belief, Defendant Minster Machine Company (“Minster”) is an Ohio corporation having a place of business at 240 West Fifth Street, Minster, Ohio 45865. Upon further information and belief, Minster is doing business, has carried out business, and has had other contacts within this judicial district.

COUNT I

*(Patent Infringement)*

6. Vamco is the owner by assignment of United States Patent No. 5,720,421 (“the ‘421 patent”), issued on February 24, 1998, and titled “Electronically Controlled High Speed Press Feed.” A true and correct copy of the ‘421 patent is attached hereto as Exhibit A.

7. The ‘421 patent discloses and claims innovative and valuable inventions relating to high speed press feeds, and systems for controlling high speed press feeds, for use in feeding stock material to high speed automatic presses.

8. Upon information and belief, and during all times relevant and material hereto, Minster has manufactured, used, sold and/or offered for sale in the United States high speed press feeds, and systems for controlling high speed press feeds, for use in feeding stock material to high speed automatic presses. Upon further information and belief, during the relevant and material time period, these feeds and control systems have been marketed, sold and/or offered for

sale by Minster in the United States as, among others, the Minster MHSF3 High Speed Servo Feed.

9. Upon information and belief, Minster has infringed and is continuing to infringe one or more claims of the '421 patent under 35 U.S.C. § 271(a) by making, using, selling, and/or offering for sale the Minster MHSF3 High Speed Servo Feed.

10. By reason of the foregoing, Vamco has been damaged in an amount that is yet to be ascertained and has suffered and will continue to suffer irreparable loss and injury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Vamco International, Inc. prays as to Count I:

- A) that Minster, its officers, agents, servants, employees, and attorneys be preliminarily and permanently enjoined from infringing the '421 patent;
- B) that judgment be entered that Minster has infringed the '421 patent;
- C) that Minster be found liable to Vamco for its acts of infringement and be ordered to pay compensatory damages pursuant to 35 U.S.C. § 284 as a result of infringement the '421 patent, including all damages suffered by Vamco as a result of the infringement;
- D) that this case be adjudged and decreed exceptional under 35 U.S.C. § 285 and that Minster be ordered to pay the expenses and costs incurred by Vamco, including reasonable attorneys' fees, pursuant to 35 U.S.C. § 285;
- E) that Vamco be awarded its costs and prejudgment interest on all damages pursuant to 35 U.S.C. § 284; and

F) that Vamco be awarded such further relief as the Court shall deem appropriate.

Respectfully submitted,

Dated: September 8, 2005

/s Frederick H. Colen

Frederick H. Colen

Pa. I.D. No. 21833

Barry J. Coyne

Pa. I.D. No. 77007

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Attorneys for Plaintiff Vamco International, Inc.

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THE MINSTER MACHINE COMPANY,             )  
   )  
                                  Defendant.         )

**JURY DEMAND**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby  
demands a jury trial for all issues properly triable before a jury.

Respectfully submitted,

Dated: September 8, 2005

/s Frederick H. Colen  
Frederick H. Colen  
Pa. I.D. No. 21833  
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